Northern District of California

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AARON VELARDE, et al.,

Plaintiffs,

v.

UNION CITY POLICE DEPARTMENT, et

Defendants.

Case No. 13-cv-04011-JD

PROPOSED SPECIAL VERDICT FORM

The Court proposes to provide the jury with this special verdict form on December 11, 2015. The parties have until 7:30 a.m. on December 11, 2015 to file any objections to this proposed verdict form.

IT IS SO ORDERED.

Dated: December 10, 2015

JAMES ONATO United States District Judge

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1	Your answers must be unanimous:			
2				
3	Question No. 1: Section 1983 Excessive Force under the Fourth Amendment			
4	Do you find by a preponderance of the evidence that one or more of the defendants violated Heid			
5	Velarde's Fourth Amendment rights by using unreasonable force against her?			
6	BaumgartnerYESNO			
7	J. MartinYESNO			
8				
9	Question No. 2: Section 1983 Unlawful Arrest under the Fourth Amendment			
10	Do you find by a preponderance of the evidence that one or more of the defendants violated Heide			
11	Velarde's Fourth Amendment rights by arresting her without probable cause?			
12	BaumgartnerYESNO			
13	J. MartinYESNO			
14				
15	Question No. 3: State Law Assault			
16	Do you find by a preponderance of the evidence that one or more of the defendants assaulted			
17	Heide Velarde?			
18	BaumgartnerYESNO			
19	J. MartinYESNO			
20				
21	Question No. 4: State Law Battery			
22	Do you find by a preponderance of the evidence that one or more of the defendants battered Heide			
23	Velarde?			
24	BaumgartnerYESNO			
25	J. MartinYESNO			
26				
27				

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Question	n No. 5: State Law False Arrest
Do you find by a preponderance of the	ne evidence that one or more of the defendants wrongfully
arrested Heide Velarde?	
BaumgartnerYES	NO
J. MartinYES	NO
	Question No. 6: Damages
Answer this question only if you ar	nswered "yes" in at least one of Questions 1 through 5.
What amount of damages has Heide	Velarde proven by a preponderance of evidence that will
fairly and reasonably compensate her	r for her injury?
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Dated:	
	FOREPERSON